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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

10 JOHN DOE,

11 Plaintiff,

12
13 v.

14 KRISTI NOEM, in her official capacity as
15 Secretary of Homeland Security;
16 DEPARTMENT OF HOMELAND
17 SECURITY ("DHS"); TODD LYONS, in his
18 official capacity as Acting Director of U.S.
19 Immigration and Customs Enforcement;
20 IMMIGRATION AND CUSTOMS
21 ENFORCEMENT ("ICE"); RACHEL
22 CANTY, in her official capacity as Deputy
23 Assistant Director of SEVP; STUDENT AND
24 EXCHANGE VISITOR PROGRAM
25 ("SEVP"); and UNKNOWN OFFICER(S)
#1-6 of the United States government sued in
their personal capacities.

26 Defendants.

DECLARATION

Case No: 2:25-cv-00633

**DECLARATION OF JOHN DOE IN
SUPPORT OF A TEMPORARY
RESTRAINING ORDER AND
PROCEEDING WITH A PSEUDONYM**

27 **DECLARATION OF JOHN DOE**

28 I, John Doe, pursuant to 28 U.S.C. § 1746, declare as follows:

- 1 1. My pseudonym is John Doe. I am over 18 years of age, have personal knowledge of the facts
2 stated herein, and am competent to testify to these facts. I am a citizen of China and currently
3 reside in King County, Washington.
- 4 2. I have good reason to fear retaliation and severe social and legal repercussions in the U.S.
5 and China due to the termination of my student status, my criminal charge, and filing this
6 case, if my identity becomes public.
- 7 3. I have watched the news about recent immigration enforcement activities in the United
8 States. I have read many stories of international students and other nonimmigrants being
9 arbitrarily detained and deported without notice or due process. Many students whose SEVIS
10 records were suddenly terminated have been detained and removed without opportunity to
11 challenge termination of their student status. I have also read of other nonimmigrants being
12 indefinitely detained, transferred to foreign prisons without review of their cases, and denied
13 access to counsel and the courts. These actions by the U.S. government make me fear that
14 revealing my identity would subject me to the same fate before this Court can consider my
15 claims.
- 16 4. I have also read that targeted students and other nonimmigrants have been publicly accused
17 of bad things by the U.S. government without an opportunity to rebut those claims, which
18 has resulted in harassment. ICE has deported people to El Salvador based on unsubstantiated
19 allegations of misconduct without due process and I fear the same thing could happen to me.
20 Because my SEVIS record is supposedly terminated, I fear being detained and transferred to
21 a foreign prison, in addition to online and public harassment if my name appears in court
22 filings or the media. Using a pseudonym is critical to avoiding these risks and protecting my
23 safety.
- 24 5. If I am forced to end my studies and depart from the United States, I will lose four years of
25 doctoral work and suffer lasting cultural stigma that will undermine my personal reputation,
26 career prospects, future academic opportunities, and social standing. The wrongful
27 termination of my SEVIS record will also jeopardize my future eligibility for U.S. visas,
28 cutting off vital academic and professional opportunities. Currently, because my SEVIS

1 record has been terminated I am now considered out of status and cannot participate in
2 critical activities in my doctoral program. Those activities are funded by grants from national
3 organizations and my research is vital to the project's success and compliance with grant
4 reporting. If I unable to return to my program soon, I will lose my grants and research
5 project.

6 6. I entered the United States lawfully on an F-1 student visa on May 11, 2021, and re-entered
7 after a brief trip to Canada on June 8, 2023. At my June 8, 2023, re-entry, Customs and
8 Border Protection allowed me to return to the U.S. after a brief trip by land to Canada in
9 order to continue my course of study. With my F-1 student status, I am allowed to live and
10 study in the United States as long as I continuously maintain and do not violate the
11 conditions of my status.

12 7. I am currently enrolled as a doctoral student at the University of Washington, in good
13 academic standing with a GPA of 3.83, and I am on track to graduate in December 2025. I
14 have continuously maintained my status as a student and have not violated any of conditions
15 of my student visa, SEVIS status, or student status.

16 8. On April 7, 2025, at approximately 2:09 PM, the University of Washington notified me via
17 email that International Student Services had "discovered that as of today 04/07/2025" my
18 SEVIS record and Form I-20 had been marked as "terminated" by the Student and Exchange
19 Visitor Program (SEVP). According to the email from the University's Principal Designated
20 School Official (PDSO), my SEVIS record listed the termination reason as:

21 Otherwise failing to maintain status - individual identified in criminal records
22 check and/or has had their VISA revoked. SEVIS record has been terminated.

23 9. I have received no notice or indication from SEVP, the Department of Homeland Security
24 (DHS), Immigration and Customs Enforcement (ICE), or any other government agency that
25 my SEVIS record would be or has been terminated. I have only been notified by my school.
26 Furthermore, to my knowledge, my expired F-1 student visa has also not been revoked.

27 10. I was provided no opportunity for a hearing, no chance to respond, and no meaningful
28 explanation for this termination beyond the vague statement in the email. I have

continuously met the full course of study requirements and maintained my student status through my enrollment at the University of Washington and by not working without authorization or being convicted of any crime of violence.

11. The only reason, to my knowledge, that I may be identified in a criminal records check is because I was arrested and charged with a DUI in September 2023. My criminal case is still ongoing and I have not been convicted. My criminal defense lawyer, Robert J. Ault, has provided a letter explaining the current procedural status and explicitly confirmed that no conviction has occurred. My criminal defense lawyer's letter further confirms that my pending DUI charge is a misdemeanor offense. I have continued my full-time enrollment and attended all classes while my criminal charge has been pending.

12. The termination of my SEVIS record has caused immediate, irreparable harm. If my status is not promptly restored, I will be unable to continue my studies, which would cause me to lose nearly four years of rigorous academic progress. This would force me to abandon my degree and begin anew elsewhere, destroying my academic and professional reputation and severely harming future employment opportunities.

13. I am gravely concerned about the reputation damage that will result from the termination of my SEVIS record. My academic peers, colleagues, and future employers will inevitably suspect me of having committed a crime of violence, well beyond my pending misdemeanor DUI charge. Furthermore, I fear that public knowledge of my DUI would carry significant social repercussions in China, where it would severely damage employment, academic, and family relationships. Public knowledge of both the termination of my SEVIS record in the U.S. and my being charged with a DUI would permanently damage my professional and academic reputation in the United States and China.

14. Attached to this affidavit as true copies of the following supporting exhibits:

Exhibit A: Redacted copy of my current Form I-20;

Exhibit B: Copy of the email from the University of Washington notifying me of the SEVIS termination dated April 7, 2025; and

Exhibit C: Letter from my criminal defense attorney confirming the absence of any conviction related to my pending DUI charge.

1 15. Given these extraordinary circumstances, I respectfully request that my SEVIS record be
2 immediately reinstated and my lawful status in the U.S. restored.
3

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct.
6

7 Executed on April 11th, 2025, in Seattle, Washington.
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9 John Doe

10 John Doe
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